Broadband USA Applications Database

Applicant Name: TelJet Longhaul LLC

_____Public Notice Submissions_____

-----Service Area: Littleton-Shelburne

Submitter: Time Warner Cable

Comment: As shown in the attached map and exhibit, TWC currently provides broadband Internet access service in the Proposed Funded Service Area. In addition, we advertise service of speeds above 3 Mbps throughout this service area. We pass over 50% of households, and either (1) have actual broadband subscribership of over 40% of the households in these census blocks or (2) the combined broadband subscribership of the wireline broadband providers (including TWC) in these census blocks is reasonably likely to exceed 40%. Therefore, that portion of the proposed funded service area that overlaps Respondent's service area reflected in this response is neither "unserved" or "underserved."

Submitter: FAIRPOINT COMMUNICATIONS, INC.

Comment: FairPoint Communications is the largest ILEC in the State of NH. FairPoint offers an array of broadband services throughout the proposed funded service area of this application. These services utilize an existing fiber middle-mile network, which connects to a robust last-mile system to provide both residential and business customers with transfer speeds from 768K to 100 Mbps.

Submitter: segTEL, Inc.

Comment: Areas in the applicant's proposal overlap service areas in which we provide broadband service.

-----Service Area: Hanover-Nashua

Submitter: TDS Telecom

Comment: TDS Telecom offers 3Mbps broadband service within the applicants proposed service area and provides broadband service to customers pursuant to the NOFA definitions.

Submitter: FAIRPOINT COMMUNICATIONS, INC.

Comment: FairPoint Communications is the largest ILEC in the State of NH. FairPoint offers an array of broadband services throughout the proposed funded service area of this application. These services utilize an existing fiber middle-mile network, which connects to a robust last-mile system to provide both residential and business customers with transfer speeds from 768K to 100 Mbps.

Submitter: Comcast Cable

Comment: Attached is a summary of the Comcast Cable homes passed, subscriber and advertising information related to the service areas encompassed by this application.

Submitter: segTEL, Inc.

Comment: Portions of route proposed by applicant overlap my company's broadband service areas and the broadband service areas of other providers.

-----Service Area: Nashua-Guilford

Submitter: TDS Telecom

Comment: TDS Telecom offers 3Mbps broadband service within the applicants proposed service area and provides broadband service to customers pursuant to the NOFA definitions.

Submitter: FAIRPOINT COMMUNICATIONS, INC.

Comment: FairPoint Communications is the largest ILEC in the State of VT. FairPoint offers an array of broadband services throughout the proposed funded service area of this application. These services utilize an existing fiber middle-mile network, which connects to a robust last-mile system to provide both residential and business customers with transfer speeds from 768K to 100 Mbps.

Submitter: Comcast Cable

Comment: Attached is a summary of the Comcast Cable homes passed, subscriber and advertising information related to the service areas encompassed by this application.

Submitter: segTEL, Inc.

Comment: Areas in applicant's proposal overlap our broadband service area and the broadband service areas of other providers.

Submitter: Time Warner Cable

Comment: As shown in the attached map and exhibit, TWC currently provides broadband Internet access service in the Proposed Funded Service Area. In addition, we advertise service of speeds above 3 Mbps throughout this service area. We pass over 50% of households, and either (1) have actual broadband subscribership of over 40% of the households in these census blocks or (2) the combined broadband subscribership of the wireline broadband providers (including TWC) in these census blocks is reasonably likely to exceed 40%. Therefore, that portion of the proposed funded service area that overlaps Respondent's service area reflected in this response is neither "unserved" or "underserved."

-----Service Area: Williston-Hanover

Submitter: TDS Telecom

Comment: TDS Telecom offers 3Mbps broadband service within the applicants proposed service area and provides broadband service to customers pursuant to the NOFA definitions.

Submitter: FAIRPOINT COMMUNICATIONS, INC.

Comment: FairPoint Communications is the largest ILEC in the State of Vermont. FairPoint offers an array of broadband services throughout the proposed funded service area of this application. These services utilize an existing fiber middle-mile network, which connects to a robust last-mile system to provide both residential and business customers with transfer speeds from 768K to 100 Mbps.

Submitter: Comcast Cable

Comment: Attached is a summary of the Comcast Cable homes passed, subscriber and advertising information related to the service areas encompassed by this application.

Submitter: Sovernet Communications

Comment: Respondent identifies other services already available along the Vermont segments of TelJet's proposed project.

Submitter: Vermont Telephone Company, Inc.

Comment: Much of the new optical fiber build proposed by TelJet Longhaul LLC parallels or duplicates the routes of several existing fiber-optic networks, including our own VTel fiber network used to support our own telephone network, and to support the networks of our key customers.

Submitter: Level 3 EON, LLC

Comment: Level 3 EON, LLC is filing this challenge based on the network services provided by Level 3 Communications ("Level 3"), LLC.

The overlapping service areas are drawn via the mapping tool. Level 3's fiber optic network infrastructure can support low speeds to support today's lower bandwidth needs and can scale to 40G and 100G to meet future bandwidth demands.

Absent some demonstrable cost or technology advantages, government funds should not be used to build along the same routes, and to the same communities, as existing and operating fiber optic networks. In the course of evaluating these projects, the Agencies should determine what other known network assets are already in place and operating, and should require applicants to take advantage of such networks. Level 3 has identified where its network is capable of delivering all or some significant

portion of the connectivity that the applicant proposes to deliver for a fraction of the cost proposed by the applicant.

Applicants should be required to demonstrate that they have exhausted commercial options involving use of existing infrastructure or services. In this regard, Level 3 notes that the Agencies' rules make it clear that a capitalized capacity lease is eligible for funding under BTOP and BIP. The capital costs of deploying fiber is only a fraction of the total network cost. Deploying, operating and maintaining electronic gear makes up the bulk of cost associated with operating a new fiber optic network. Capitalized capacity leases allow multiple last-mile and middle mile providers to share these significant expenses on a flexible, scalable basis.

Using a capitalized capacity lease, a last mile provider could procure precisely the capacity it needs when needed to serve its community. This option scalable and allows service providers to secure smaller amounts of capacity as an initial matter, adding to the capacity only when demands require. It also adds to project sustainability by reducing both operating and maintenance costs. In addition, as long as Level 3's network is in proximity, affordable hybrid fiber-microwave technologies can be used to establish interconnects back to the capacity IRUs. Multiple BTOP and BIP applicants can use identified capacity on a specific system, but capture the lower costs associated with the sharing of transport expenses.